

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION**

TERESA MOWERY and
GREGORY RUTLEDGE,
On Behalf of Themselves and
All Others Similarly Situated,

Plaintiffs,

v.

SAINT FRANCIS HEALTHCARE SYSTEM,
Defendant.

Case No. 1:20-cv-00013-SRC

**DECLARATION OF RAMSEY ENGLER REGARDING
IMPLEMENTATION OF NOTICE AND SETTLEMENT ADMINISTRATION**

I, Ramsey Engler, declare and state as follows:

1. I am a Project Manager employed by Epiq Class Action & Claims Solutions, Inc. Prior to joining Epiq in 2019, I received my Bachelor of Arts from Lewis & Clark College. The following statements are based on my personal knowledge and information provided by other experienced Epiq employees working under my supervision and, if called on to do so, I could and would be competent to testify thereto.

2. Epiq was established in 1968 as a client services and data processing company. Epiq has been administering bankruptcies since 1985 and settlements since 1993, including settlements of class actions, mass tort litigations, Securities and Exchange Commission enforcement actions, Federal Trade Commission disgorgement actions, insurance disputes, bankruptcies, and other major litigation. Epiq has administered more than 1,000 settlements, including some of the largest and most complex cases ever settled. Epiq's class action case

administration services include coordination of all notice requirements, design of direct-mail notices, establishment and implementation of notice fulfillment services, coordination with the United States Postal Service (“USPS”), notice website development and maintenance, dedicated phone lines with recorded information and/or live operators, receipt and processing of opt-outs, claims database management, claim adjudication, funds management, and award calculations and distribution services. Epiq works with the settling parties, the Court, and the Class Members in a neutral facilitation role to implement settlement administration services based on the negotiated terms of a settlement.

3. Epiq was appointed as the Claims Administrator pursuant to the Court’s August 17, 2020, Order Granting Preliminary Approval of Class Action Settlement (the “Order”). In accordance with the Settlement Agreement and Release (the “Agreement”)¹ and the Court’s Order, I submit this Declaration so as to advise the Parties and the Court regarding implementation of notice to the Class.

OVERVIEW OF ADMINISTRATION

4. Pursuant to the Order, Epiq was appointed to provide the following administrative services for the benefit of Settlement Class Members, as defined in the Agreement:

¹ All capitalized terms not otherwise defined in this document shall have the same meaning ascribed to them in the Agreement

- Provide notice to Settlement Class Members by email or mailed postcard notice;
- Establish and maintain an official website containing information regarding the proposed Settlement and where Settlement Class Members can file claims online;
- Establish and maintain an official toll-free number that Settlement Class Members may contact for additional information about the Settlement;
- Review and process opt-out requests received by Epiq;
- Review and track objections received by Epiq;
- Receive, process, track, and report on Claim Forms received by Epiq;

CAFA NOTICE

5. As described in the attached *Declaration of Stephanie J. Fiereck, Esq. on Implementation of CAFA Notice*,” dated November 2, 2020 (“*Fiereck Declaration*”), on August 27, 2020, as required by the federal Class Action Fairness Act of 2005 (CAFA), 28 U.S.C. § 1715, Epiq sent a CAFA notice packet (or “CAFA Notice”) to 57 federal and state officials. The CAFA Notice was mailed by certified mail to 56 officials, including the Attorneys General of each of the 50 states, the District of Columbia and the U.S. Territories. The CAFA Notice was also sent by United Parcel Service (“UPS”) to the Attorney General of the United States. The *Fiereck Declaration* is attached hereto as Exhibit A.

CLASS DATA TRANSFER

6. On August 21, 2020, an electronic file was provided to Epiq, which contained contact information including (i) names, (ii) mailing addresses, and (iii) email addresses.

7. Epiq loaded the Settlement Class Data into a dedicated database created for the purpose of the Settlement Administration. Epiq assigned unique identifiers to all records to

maintain the ability to track them throughout the Settlement administration.

NOTICE PROGRAM

8. On July 31, 2020, Epiq sent the Email Notice to 23,106 Settlement Class Members pursuant to Section IV.59 of the Agreement. Epiq caused the Court-approved Notice to be formatted for electronic distribution by email and sent to Settlement Class Members when an email address was available. Each Email Notice included the Settlement Class Member's unique identifier and was sent in a manner calculated to avoid being caught and excluded by spam filters or other devices intended to block mass email; 2,686 Email Notices subsequently bounced back as undeliverable. Attached hereto as Exhibit B is a template of the Email Notice sent to Settlement Class Members.

9. On July 31, 2020, Epiq sent a Postcard Notice by U.S. Mail to 67,268 Settlement Class Members not able to be noticed by email but who had a valid mailing address. Pursuant to Section IV.60(a) of the Agreement, Epiq caused the Court-approved Notice to be formatted for distribution by mail as a postcard notice including a unique identifier and a detachable, postage pre-paid claim form. Attached hereto as Exhibit C is a template of the Postcard Notice sent to Settlement Class Members.

10. As of November 2, 2020, 2,839 Postcard Notices have been returned as undeliverable. As per the Agreement, Epiq has and will continue to perform reasonable address tracing and re-mailing the Postcard Notice where an updated mailing address is located. As of November 2, 2020, Epiq has re-mailed 1,546 Postcard Notices.

11. Prior to mailing Postcard Notices, all mailing addresses were checked against the National Change of Address ("NCOA") database maintained by the United States Postal Service ("USPS"). In addition, the addresses were certified via the Coding Accuracy Support System

(“CASS”) to ensure the quality of the zip code, and verified through Delivery Point Validation (“DPV”) to verify the accuracy of the addresses. To the extent that any Class Member had filed a USPS change of address request, and the address was certified and verified, the current address listed in the NCOA database was used in connection with the Notice mailing.

12. As of November 2, 2020, the Postcard Notice Mailing and the Email Notice combined reached 93.55% of Settlement Class Members. Epiq will continue remailing efforts until just before the claim filing deadline.

SETTLEMENT WEBSITE

13. Pursuant to Section II.39 of the Agreement, on August 31, 2020, Epiq launched the Settlement Website, www.MoweryRansomwareSettlement.com, containing detailed information about the Settlement. The Settlement Website address was included in the Notice sent to Settlement Class Members. The Settlement Agreement, Order Granting Preliminary Approval of Class Action Settlement, and Long Form and Summary Notices in English and Spanish were posted on the Settlement Website so that potential claimants may review and download them. The website also contains a summary of options available to Settlement Class Members, deadlines to act, and provides answers to frequently asked questions. Settlement Class Members are also able to file a Claim online via the website, or download a paper Claim Form, which they could then file by mail or email. References to the website were prominently displayed in all notice documents.

14. As of November 2, 2020, there have been 7,207 page views in 1,414 website sessions. A website session is the number of times website visitors entered the site and interacted with the site for any length of time until a period of 30 minutes of inactivity. A single session can contain multiple page views.

TOLL-FREE INFORMATION LINE

15. On August 31, 2020, Epiq launched the toll-free automated information line, 877-890-8129. By calling the toll-free number, Settlement Class Members can listen to answers to frequently asked questions. This automated system is available 24 hours per day, 7 days per week.

16. As of November 2, 2020, the toll-free number has handled 1,071 calls representing 3,685 minutes of use.

REQUESTS FOR EXCLUSION AND OBJECTIONS

17. Settlement Class Members who wished to be excluded from the Settlement are required to mail a written request to be excluded from the Settlement to Epiq, postmarked on or before October 16, 2020. As of November 2, 2020, Epiq has received 15 requests for exclusion, each of them from a confirmed Settlement Class Member.

18. Settlement Class Members who wish to object to the Settlement are instructed to send objections to the Court and Counsel, postmarked on or before October 16, 2020. As of November 2, 2020, Epiq is not aware of any objections that have been filed.

CLAIMS RECEIVED

19. Settlement Class Members who wish to make a claim are required to either submit a Claim online or mail a completed Claim Form via U.S. Mail to Epiq no later than December 1, 2020. As of November 2, 2020, Epiq has received 421 Claims: 75 Claim Forms received by mail, and 346 Claims filed online.²

² As Epiq is still receiving, reviewing, and processing timely and late claims, the claims information provided herein is subject to further analysis for eligibility and quality control, and is, therefore, preliminary at this time.

I declare under penalty of perjury under the laws of the United States and the State of Oklahoma that the foregoing is true and correct to the best of my knowledge and belief and that this declaration was executed on November 3, 2020 in Seattle, Washington.

Ramsey Engler

Ramsey Engler
Project Manager
Epiq Class Action & Claim Solutions, Inc.

Exhibit A

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION**

**TERESA MOWERY and
GREGORY RUTLEDGE,
On Behalf of Themselves and All Others
Similarly Situated,**

Plaintiffs,

v.

SAINT FRANCIS HEALTHCARE SYSTEM,

Defendant.

Case No. 1:20-cv-00013-SRC

**DECLARATION OF STEPHANIE J. FIERECK, ESQ. ON IMPLEMENTATION OF
CAFA NOTICE**

I, STEPHANIE J. FIERECK, ESQ., hereby declare and state as follows:

1. My name is Stephanie J. Fiereck, Esq. I am over the age of 21 and I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.

2. I am the Legal Notice Manager for Epiq Class Action & Claims Solutions, Inc. (“Epiq”), a firm that specializes in designing, developing, analyzing and implementing large-scale, un-biased, legal notification plans.

3. Epiq is a firm with more than 20 years of experience in claims processing and settlement administration. Epiq’s class action case administration services include coordination of all notice requirements, design of direct-mail notices, establishment of fulfillment services, receipt and processing of opt-outs, coordination with the United States Postal Service, claims database management, claim adjudication, funds management and distribution services.

4. The facts in this Declaration are based on what I personally know, as well as information provided to me in the ordinary course of my business by my colleagues at Epiq.

DECLARATION OF STEPHANIE J. FIERECK, ESQ. ON IMPLEMENTATION OF CAFA NOTICE

CAFA NOTICE IMPLEMENTATION

5. At the direction of counsel for the Defendant Saint Francis Healthcare System, 57 officials, which included the Attorney General of the United States and the Attorneys General of each of the 50 states, the District of Columbia and the United States Territories were identified to receive the CAFA notice.

6. Epiq maintains a list of these state and federal officials with contact information for the purpose of providing CAFA notice. Prior to mailing, the names and addresses selected from Epiq's list were verified, then run through the Coding Accuracy Support System ("CASS") maintained by the United States Postal Service ("USPS").¹

7. On August 27, 2020, Epiq sent 57 CAFA Notice Packages ("Notice"). The Notice was mailed by certified mail to 56 officials, including the Attorneys General of each of the 50 states, the District of Columbia and the United States Territories. The Notice was also sent by United Parcel Service ("UPS") to the Attorney General of the United States. The CAFA Notice Service List (USPS Certified Mail and UPS) is included hereto as **Attachment 1**.

8. The materials sent to the Attorneys General included a cover letter, which provided notice of the proposed settlement of the above-captioned case. The cover letter is included hereto as **Attachment 2**.

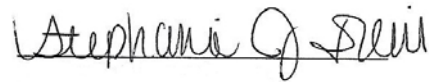
9. The cover letter was accompanied by a CD, which included the following:

- a. Class Action Complaint;
- b. Notice of Errata (with exhibits):
 - Exhibit 1 - Settlement Agreement and Release Agreement (with exhibits);

¹ CASS improves the accuracy of carrier route, 5-digit ZIP®, ZIP + 4® and delivery point codes that appear on mail pieces. The USPS makes this system available to mailing firms who want to improve the accuracy of postal codes, i.e., 5-digit ZIP®, ZIP + 4®, delivery point (DPCs), and carrier route codes that appear on mail pieces.

- Exhibits A-D – Forms of Notice;
 - Exhibit E – Experian Information;
 - Exhibit F – [Proposed] Order Granting Preliminary Approval of Class Action Settlement;
 - Exhibit G – [Proposed] Order and Judgment Granting Final Approval of Class Action Settlement;
- c. Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement and Memorandum in Support of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement;
- d. Order Granting Preliminary Approval of Class Action Settlement; and
- e. Geographic Distribution of Class Members and Proportionate Share of Claims.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 2, 2020.



Stephanie J. Fiereck, Esq.

Attachment 1

CAFA Notice Service List**UPS**

Company	FullName	Address1	Address2	City	State	Zip
US Department of Justice	William Barr	950 Pennsylvania Ave NW		Washington	DC	20530

CAFA Notice Service List
USPS Certified Mail

Company	FullName	Address1	Address2	City	State	Zip
Office of the Attorney General	Kevin G Clarkson	PO Box 110300		Juneau	AK	99811
Office of the Attorney General	Steve Marshall	501 Washington Ave		Montgomery	AL	36130
Office of the Attorney General	Leslie Carol Rutledge	323 Center St	Suite 200	Little Rock	AR	72201
Office of the Attorney General	Mark Brnovich	2005 N Central Ave		Phoenix	AZ	85004
Office of the Attorney General	CAFA Coordinator	Consumer Law Section	455 Golden Gate Ave Ste 11000	San Francisco	CA	94102
Office of the Attorney General	Phil Weiser	Ralph L Carr Colorado Judicial Center	1300 Broadway 10th Fl	Denver	CO	80203
Office of the Attorney General	William Tong	55 Elm St		Hartford	CT	06106
Office of the Attorney General	Karl A. Racine	441 4th St NW	Suite 1100 South	Washington	DC	20001
Office of the Attorney General	Kathy Jennings	Carvel State Office Bldg	820 N French St	Wilmington	DE	19801
Office of the Attorney General	Ashley Moody	State of Florida	The Capitol PL-01	Tallahassee	FL	32399
Office of the Attorney General	Chris Carr	40 Capitol Square SW		Atlanta	GA	30334
Department of the Attorney General	Clare E. Connors	425 Queen St		Honolulu	HI	96813
Iowa Attorney General	Thomas J Miller	1305 E Walnut St		Des Moines	IA	50319
Office of the Attorney General	Lawrence G Wasden	700 W Jefferson St Ste 210	PO Box 83720	Boise	ID	83720
Office of the Attorney General	Kwame Raoul	100 W Randolph St		Chicago	IL	60601
Indiana Attorney General's Office	Curtis T Hill Jr	Indiana Government Center South	302 W Washington St 5th Fl	Indianapolis	IN	46204
Office of the Attorney General	Derek Schmidt	120 SW 10th Ave 2nd Fl		Topeka	KS	66612
Office of the Attorney General	Daniel Cameron	700 Capitol Avenue	Suite 118	Frankfort	KY	40601
Office of the Attorney General	Jeff Landry	PO Box 94005		Baton Rouge	LA	70804
Office of the Attorney General	Maura Healey	1 Ashburton Pl		Boston	MA	02108
Office of the Attorney General	Brian E. Frosh	200 St Paul Pl		Baltimore	MD	21202
Office of the Attorney General	Aaron Frey	6 State House Station		Augusta	ME	04333
Department of Attorney General	Dana Nessel	PO Box 30212		Lansing	MI	48909
Office of the Attorney General	Keith Ellison	445 Minnesota St	Suite 1400	St Paul	MN	55101
Missouri Attorney General's Office	Eric Schmitt	207 West High Street	PO Box 899	Jefferson City	MO	65102
MS Attorney General's Office	Lynn Fitch	Walter Sillers Bldg	550 High St Ste 1200	Jackson	MS	39201
Office of the Attorney General	Tim Fox	Department of Justice	PO Box 201401	Helena	MT	59620
Attorney General's Office	Josh Stein	9001 Mail Service Ctr		Raleigh	NC	27699
Office of the Attorney General	Wayne Stenehjem	State Capitol	600 E Boulevard Ave Dept 125	Bismarck	ND	58505
Nebraska Attorney General	Doug Peterson	2115 State Capitol	PO Box 98920	Lincoln	NE	68509
Office of the Attorney General	Gordon MacDonald	NH Department of Justice	33 Capitol St	Concord	NH	03301
Office of the Attorney General	Gurbir S Grewal	25 Market Street	P.O. Box 080	Trenton	NJ	08625
Office of the Attorney General	Hector Balderas	408 Galisteo St	Villagra Bldg	Santa Fe	NM	87501
Office of the Attorney General	Aaron Ford	100 N Carson St		Carson City	NV	89701
Office of the Attorney General	Letitia James	The Capitol		Albany	NY	12224
Office of the Attorney General	Dave Yost	30 East Broad Street	14th Floor	Columbus	OH	43215
Office of the Attorney General	Mike Hunter	313 NE 21st St		Oklahoma City	OK	73105
Office of the Attorney General	Ellen F Rosenblum	Oregon Department of Justice	1162 Court St NE	Salem	OR	97301
Office of the Attorney General	Josh Shapiro	16th Fl Strawberry Square		Harrisburg	PA	17120
Office of the Attorney General	Peter F Neronha	150 S Main St		Providence	RI	02903
Office of the Attorney General	Alan Wilson	PO Box 11549		Columbia	SC	29211
Office of the Attorney General	Jason Ravnsborg	1302 E Hwy 14 Ste 1		Pierre	SD	57501
Office of the Attorney General	Herbert H. Slatery III	PO Box 20207		Nashville	TN	37202
Office of the Attorney General	Ken Paxton	300 W 15th St		Austin	TX	78701
Office of the Attorney General	Sean D. Reyes	PO Box 142320		Salt Lake City	UT	84114
Office of the Attorney General	Mark R. Herring	202 North Ninth Street		Richmond	VA	23219
Office of the Attorney General	TJ Donovan	109 State St		Montpelier	VT	05609
Office of the Attorney General	Bob Ferguson	800 Fifth Avenue	Suite 2000	Seattle	WA	98104
Office of the Attorney General	Josh Kaul	PO Box 7857		Madison	WI	53707
Office of the Attorney General	Patrick Morrissey	State Capitol Complex	Bldg 1 Room E 26	Charleston	WV	25305
Office of the Attorney General	Bridget Hill	2320 Capitol Avenue		Cheyenne	WY	82002
Department of Legal Affairs	Mitzie Jessop Taase	Executive Office Building 3rd Floor	PO Box 7	Utulei	AS	96799
Attorney General Office of Guam	Leevin T Camacho	Administration Division	590 S Marine Corps Dr Ste 901	Tamuning	GU	96913
Office of the Attorney General	Edward Manibusan	Administration Bldg	PO Box 10007	Saipan	MP	96950
PR Department of Justice	Ines Carrau Martinez	PO Box 9020192		San Juan	PR	00902
Department of Justice	Denise N. George	34-38 Kronprindsens Gade	GERS Bldg 2nd Fl	St Thomas	VI	00802

Attachment 2

NOTICE ADMINISTRATOR

HILSOFT NOTIFICATIONS
10300 SW Allen Blvd
Beaverton, OR 97005
P 503-350-5800
DL-CAFA@epiqglobal.com

August 27, 2020

VIA UPS OR USPS CERTIFIED MAIL

Class Action Fairness Act – Notice to Federal and State Officials

Dear Sir or Madam:

Pursuant to the “Class Action Fairness Act,” (“CAFA”), 28 U.S.C. §1715, please find enclosed information from Defendant Saint Francis Healthcare System relating to the proposed settlement of a class action lawsuit.

- **Case:** *Mowery et al. v. Saint Francis Healthcare System*, Case No. 1:20-cv-00013-SPC.
- **Court:** United States District Court, Eastern District of Missouri, Cape Girardeau Division.
- **Defendant:** Saint Francis Healthcare System.
- **Judicial Hearing Scheduled:** The Court has scheduled a Final Approval Hearing for November 17, 2020. At the time of the hearing, these matters may be continued without further notice.
- **Documents Enclosed:** Copies of the following documents are contained on the enclosed CD:
 1. Class Action Complaint;
 2. Notice of Errata (with exhibits):
 - Exhibit 1 - Settlement Agreement and Release Agreement (with exhibits);
 - Exhibits A-D – Forms of Notice;
 - Exhibit E – Experian Information;
 - Exhibit F – [Proposed] Order Granting Preliminary Approval of Class Action Settlement;
 - Exhibit G – [Proposed] Order and Judgment Granting Final Approval of Class Action Settlement;
 3. Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement and Memorandum in Support of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement;
 4. Order Granting Preliminary Approval of Class Action Settlement; and
 5. Geographic Distribution of Class Members and Proportionate Share of Claims.

Very truly yours,

Notice Administrator

Enclosures

Exhibit B

Subject of Email: Notice of Settlement – Mowery Ransomware Settlement

(Body of email below, dynamic text is in purple and will appear black in final email)

ATTENTION:

\$\$Name1\$\$

Settlement Claim ID: \$\$ACCT\$\$

Mowery et al. v. Saint Francis Healthcare System – Case No. 1:20-cv-00013-SRC

If your private information was in the possession of Saint Francis Healthcare System and potentially impacted by the cybersecurity incident involving Ferguson Medical Group discovered on or about September 21, 2019, you may be entitled to a payment from a class action settlement.

(Si desea recibir una notificación en español, visite nuestro sitio web)

A settlement has been proposed in a class action lawsuit against Saint Francis Healthcare System (“Saint Francis”) relating to a cybersecurity incident involving the legacy systems of Ferguson Medical Group discovered on or about September 21, 2019 (the “Ransomware Attack” or “Incident”). The computer systems affected by the Incident potentially contained certain personal and protected health information (such as Social Security numbers, health insurance information, and other protected health information) relating to Ferguson Medical Group patients.

The lawsuit claims that Saint Francis was responsible for the increased risk of fraud and identity theft stemming from the Ransomware Attack and asserts claims such as: negligence; negligence per se; intrusion upon seclusion/invasion of privacy; violation of the Missouri Merchandise Practices Act; breach of fiduciary duty; breach of express contract; and breach of implied contract. The lawsuit seeks, among other things, payment for persons who were injured by the Ransomware Attack. Saint Francis denies all of the claims and says it did not do anything wrong.

Who Is Included: If you are an individual whose Private Information was received, gathered, shared, obtained, or otherwise found itself in the possession of Saint Francis and was potentially impacted by the Ransomware Attack, you are a part of the class and may be eligible for a payment.

Settlement Benefits: The Settlement provides for one year of credit monitoring and identity theft restoration services, valued at \$100, for any Settlement Class Member who submits a valid claim. The Settlement also provides for two types of payments to Class Members who submit valid claims: (1) reimbursement of out-of-pocket medical expenses incurred as a result of the Incident up to \$100, and (2) reimbursement for lost time, up to 4 hours, at a rate of \$20 per hour, for time spent addressing disruption to

medical care caused by the Incident. The total value provided to Class Members who submit valid claims shall not exceed \$350,000. In the event the total value of money claimed and credit monitoring provided exceeds \$350,000, each claim for reimbursement made under the Settlement Agreement shall be reduced on a pro rata basis until the total is reduced to \$350,000. Saint Francis will also be taking steps to improve its data security in the future.

The Only Way to Receive a Benefit is to File a Claim: To get a Claim Form, visit www.MoweryRansomwareSettlement.com or call (877) 890-8129. The claim deadline is December 1, 2020.

Other Options: If you do nothing, you will remain in the Class, you will not be eligible for benefits, you will be bound by the decisions of the Court, and you will give up your rights to sue Saint Francis for the claims resolved by this Settlement. If you do not want to be legally bound by the Settlement, you must exclude yourself by October 16, 2020. If you stay in the Settlement, you may object to it by October 16, 2020. A more detailed notice is available to explain how to exclude yourself or object. Please visit the website or call (877) 890-8129 for a copy of the more detailed notice. On November 17, 2020, the Court will hold a Final Approval Hearing to determine whether to approve the Settlement, Class Counsel's request for attorneys' fees and costs of \$170,000, and an Incentive Award of \$2,500 for each Class Representative. The Motion for attorneys' fees and costs will be posted on the website after it is filed. You or your own lawyer, if you have one, may ask to appear and speak at the hearing at your own cost, but you do not have to. This is only a summary. For more information, call or visit the website below.

For More Information about the Settlement: visit www.MoweryRansomwareSettlement.com or call (877) 890-8129. **All capitalized terms in this notice are defined in the Settlement Agreement.**

Exhibit C

Mowery Ransomware Settlement Administrator
PO Box 2915
Portland, OR 97208-2915

If your private information was in the possession of St. Francis Healthcare System and potentially impacted by the cybersecurity incident involving Ferguson Medical Group discovered on or about September 21, 2019, you may be eligible for a payment from a class action settlement.

*Si desea recibir esta notificación en español,
llámenos o visite nuestra página web.*

A settlement has been proposed in a class action lawsuit against Saint Francis Healthcare System, (“Saint Francis”) relating to a cybersecurity incident involving the legacy systems of Ferguson Medical Group discovered on or about September 21, 2019 (the “Ransomware Attack” or “Incident”). The computer systems affected by the Incident potentially contained certain personal and protected health information (such as Social Security numbers, health insurance information, and other protected health information) relating to Ferguson Medical Group patients.

**BARCODE NO
PRINT ZONE**

FIRST-CLASS MAIL
U.S. POSTAGE
PAID
Portland, OR
PERMIT NO. 2882

<<MAIL ID>>
<<NAME 1>>
<<NAME 2>>
<<ADDRESS LINE 1>>
<<ADDRESS LINE 2>>
<<ADDRESS LINE 3>>
<<ADDRESS LINE 4>>
<<ADDRESS LINE 5>>
<<CITY, STATE ZIP>>
<<COUNTRY>>

BARCODE NO PRINT ZONE

The Lawsuit claims that Saint Francis was responsible for the increased risk of fraud and identity theft stemming from the Ransomware Attack and asserts claims such as: negligence; negligence per se; intrusion upon seclusion/invasion of privacy; violation of the Missouri Merchandise Practices Act; breach of fiduciary duty; breach of express contract; and breach of implied contract. The Lawsuit seeks, among other things, payment for persons who were injured by the Ransomware Attack. Saint Francis denies all of the claims and says it did not do anything wrong.

Who is Included? If you are an individual whose Private Information was received, gathered, shared, obtained, or otherwise found itself in the possession of Saint Francis and was potentially impacted by the Ransomware Attack, you are a part of the class, and may be eligible for a payment.

Settlement Benefits. The Settlement provides for one year of Credit Monitoring and Identity Theft Restoration Services for any Settlement Class Member who submits a valid claim, valued at \$100. The Settlement also provides for two types of payments to people who submit valid claims: (1) Reimbursement of out-of-pocket medical expenses incurred as a result of the Incident up to \$100, and (2) reimbursement for lost time, up to 4 hours, at a rate of \$20 per hour for time spent addressing disruption to medical care caused by the Incident. The total value provided to people who submit valid claims shall not exceed \$350,000. In the event the total value of money claimed and credit monitoring provided exceeds \$350,000, each claim for reimbursement made under the Settlement Agreement shall be reduced on a pro rata basis until the total is reduced to \$350,000. Saint Francis will also be taking steps to improve its data security in the future.

The Only Way To Receive A Benefit Is To File A Claim. To get a Claim Form, visit www.MoweryRansomwareSettlement.com or call (877) 890-8129. The claim deadline is **December 1, 2020**. To visit the website and get a Claim Form, or to file a Claim online, please use your assigned Settlement Claim ID: <<10-digit_ID>>.

Other Options. If you do nothing, you will remain in the class, you will not be eligible for benefits, and you will be bound by the decisions of the Court and give up your rights to sue Saint Francis for the claims resolved by this Settlement. If you do not want to be legally bound by the Settlement, you must exclude yourself by **October 16, 2020**. If you stay in the Settlement, you may object to it by **October 16, 2020**. A more detailed notice is available to explain how to exclude yourself or object. Please visit the website or call (877) 890-8129 for a copy of the more detailed notice. On **November 17, 2020**, the Court will hold a Final Approval Hearing to determine whether to approve the Settlement, Class Counsel's request for attorneys' fees and costs of \$170,000, and an incentive award of \$2,500 for each Representative Plaintiff. The Motion for attorneys' fees and costs will be posted on the website after it is filed. You or your own lawyer, if you have one, may ask to appear and speak at the hearing at your own cost, but you do not have to. This is only a summary. For more information, call or visit the website below.

For more information about the Settlement, visit www.MoweryRansomwareSettlement.com or call (877) 890-8129.

All capitalized terms in this notice are defined in the Settlement Agreement.